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18 Saleh Elghasen

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**SALEH ELGHASEN,**

Plaintiff,

v.

**RBS COMPUTER, INC., d/b/a  
ROYAL MANAGEMENT  
CORPORATION; and  
EXPERIAN INFORMATION  
SOLUTIONS, INC.,,**

Defendant.

**Case No.: 2:14-cv-01539-JAD-GWF**

**DECLARATION OF DANNY J.  
HOREN IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT RBS COMPUTER,  
INC.'S MOTION TO DISMISS**

1  
2 I, Danny J. Horen, hereby declare under penalty of perjury that the following  
3 is true and correct:

- 4 1. I am the attorney for the Plaintiff, Saleh Elghasen, in the above-entitled  
5 action.
- 6 2. I am licensed to practice law in the United States District Court for the  
7 District of Nevada, and all Nevada state courts.
- 8 3. I am a member in good standing with the State Bar of Nevada.
- 9 4. I have personal knowledge of the information contained in this declaration  
10 and could testify to such if called as a witness.
- 11 5. I submit this declaration in support of Plaintiff's Opposition to Defendant  
12 RBS Computer, Inc.'s Motion to Dismiss.
- 13 6. Attached hereto as Exhibit A is a true and correct copy of a proof of claim  
14 filed in Plaintiff's Bankruptcy case (10-19019-lbr) in the United States  
15 Bankruptcy Court, District of Nevada. The proof of claim identifies  
16 Defendant's address, 25331 1h 10 West, San Antonio Texas as the address  
17 where notices should be sent.
- 18 7. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's August 5,  
19 2014 Experian credit report. The report reflects both Defendant's name and  
20 address as the entity to contact in three separate credit entries.
- 21 8. Attached hereto as Exhibit C is a true and correct copy of Experian's  
22 September 9, 2014 credit report reinvestigation letter. The letter once again  
23 reflects both Defendant's name and address as the entity to contact in multiple  
24 credit entries.
- 25 9. Attached hereto as Exhibit D is a true and correct copy of Plaintiff's August  
26 28, 2014 Experian credit report dispute letter. Plaintiff's dispute not only  
27 includes Defendant's name and address for multiple credit entries, but it also  
28 includes Plaintiff's address (redacted for Plaintiff's privacy), putting

1 Defendant on notice that credit reporting regarding the disputed accounts  
2 would be directed toward Nevada.

3 10. Attached hereto as Exhibit E is a true and correct copy of Golden Loan's  
4 Nevada Better Bureau Listing.

5 11. Attached hereto as Exhibit F is a true and correct copy of the Family Finance  
6 Nevada address listing.

7 12. Attached hereto as Exhibit G is a true and correct copy of Gentry Finance  
8 Corp. of Nevada's listing with Nevada Secretary of State. Gentry Finance  
9 Corp. of Nevada is listed as a Nevada Domestic Corporation, with A P Gentry  
10 serving as President and Director.

11 13. Attached hereto as Exhibit H is a true and correct copy of Defendant RBS  
12 Computer, Inc.'s Corporationwiki profile. The profile lists A P Gentry as  
13 President and Director.

14  
15 I declare under penalty of perjury under the laws of the State of Nevada that  
16 the foregoing is true and correct and that this declaration was signed on March 13,  
17 2015 at Las Vegas, Nevada.  
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20 By: s/ Danny J. Horen  
21 Danny J. Horen  
22 Attorney for the Plaintiff  
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